

July 26, 2023

Received  
Records Management  
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Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: FlexCharging's comments in Docket UE-220359, PacifiCorp's Transportation Electrification Plan Pursuant to RCW 80.28.365

Dear Ms. Maxwell:

FlexCharging Inc. appreciates the opportunity to provide comments in support of PacifiCorp's Transportation Electrification (TE) Plan, in particular the Managed Charging Pilot Application. On July 14, 2023, PacifiCorp filed the Managed Charging Pilot Application, which also included responses to stakeholder comments received.

FlexCharging is an EV Data Analytics and Managed Charging provider that uses existing vehicle telematics to integrate vehicles into a single managed charging platform. FlexCharging has managed charging since 2017 and have data acquisition from 72+ models and over 20 OEMs, which represents approximately 95% of the Light Duty market in the United States.

PacifiCorp's Residential Managed Charging Pilot aims to enroll owners of electric vehicles and offer them ongoing financial incentives in exchange for the access to remotely control their vehicle's charging over a three-year period from 2024 to 2026. FlexCharging would like to reiterate our strong support for this Pilot Application. In particular, FlexCharging is pleased to see PacifiCorp undertaking a multi-year pilot to push the load to less critical, off-peak times of the day and allow for an additional mechanism to respond to peak grid or localized system events. Having worked with utilities, cooperatives, and municipal and public utility districts across the country on EV managed charging pilots and programs, FlexCharging is well versed in the importance of strong program design for creating a successful offering. FlexCharging believes that PacifiCorp's Pilot, as outlined, contains defined and measurable objectives, appropriate incentive structures, and important measurement and verification activities.

Once again, FlexCharging appreciates the opportunity to provide feedback on and support for this managed charging pilot application. We look forward to PacifiCorp's successful program and we are available to discuss any of the comments above in further detail.

Sincerely,



Jossi Fritz-Mauer, Director of Program Management  
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